

U.S. DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
FILED

NOV 24 1999

ROBERT H. REMMEL, CLERK
BY DEPUTY

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAFAYETTE - OPELOUSAS DIVISION

JOEL A. MORVANT, SR., MONICA * CIVIL ACTION NO. CV 99-1427 L-O
MORVANT, JOEL A. MORVANT, JR. *
AND RIDGE M. MORVANT *

VERSUS * JUDGE SHAW
*

L&L SANDBLASTING, INC. and *
CXY ENERGY, INC. * MAGISTRATE METHVIN

PRELIMINARY EXHIBIT LIST

L&L Sandblasting, Inc., who in compliance with the Court's November 8, 1999
Scheduling Conference Order, respectfully submits that it may introduce the following
exhibits at trial:

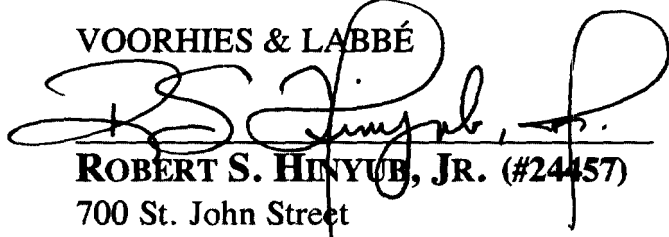
1. CXY Energy's Scope of Work Contract - will be offered to establish the nature of agreement and responsibilities of L&L Sandblasting, Inc. for job in issue;
2. Employers First Report of Injury, dated August 27, 1998 - will be offered to establish description of reported incident, witnesses and investigation as to the cause of the alleged incident;
3. L&L Sandblasting, Inc.'s Daily Time Records will be ordered to establish work being performed by plaintiff
4. Federal and State Income Tax Returns of plaintiff for 1995 through 1998 with attached W2 forms as received from the IRS - will be offered to establish actual income earned by plaintiff and earnings history;
5. Personal Earnings and Benefit Estimate Statement from Social Security Administration - will be offered to establish actual income earned by plaintiff and earnings history;
6. L&L Sandblasting, Inc.'s payroll records concerning plaintiff will be offered to establish income earned by plaintiff while employed by the Nacher Corporation;



7. Any and all hospital and/or physician records, reports, lab tests, x-rays, diagnostic test, etc., in connection with the treatment and prognosis of Brooks;
8. Employment Records of plaintiff from the L&L Sandblasting, Inc. - will be offered to establish earnings and employment history of plaintiff, other personal information provided by plaintiff, duties and responsibilities of plaintiff, and experience and training of plaintiff;
9. L&L Sandblasting, Inc.'s Safety Manual - will be offered to establish duties and responsibilities of plaintiff;
10. All relevant insurance policies;
11. All pleadings filed in this matter;
12. Any statements, depositions, and/or other documentation for impeachment or rebuttal purposes;
13. Any photographs of the scene of the alleged accident;
14. Any exhibit listed by any other party in this litigation; and
14. L&L Sandblasting, Inc. expressly reserves the right to supplement and amend this list as and when more information becomes available.

Respectfully submitted,

VOORHIES & LABBÉ



ROBERT S. HINYUB, JR. (#24457)

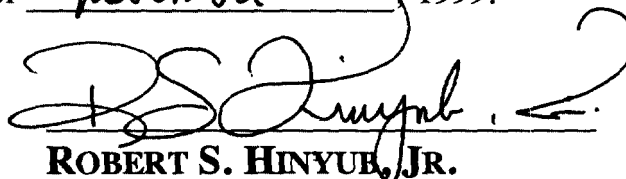
700 St. John Street
Post Office Box 3527
Lafayette, LA 70502-3527
Phone: (318) 232-9700

**Counsel for L&L SANDBLASTING,
INC.**

CERTIFICATE

I HEREBY CERTIFY that a copy of the above and foregoing has this day been forwarded to all known counsel of record by depositing same in the United States mail, postage prepaid and properly addressed.

Lafayette, Louisiana this 23rd day of November 1999.


ROBERT S. HINYUB, JR.

H. Edwin McGlasson
W. Gerald Gaudet†
Richard D. Chappuis, Jr.
William M. Bass
John Nickerson Chappuis
Robert L. Ellender
Cyd Sheree Page
Robert M. Francez
Robert M. Kallman
Elizabeth L. Gugliemotta
Sam R. Aucoin
James A. Lochridge, Jr.

Monroe Office
1900 North 18th Street
Suite 801
Monroe, Louisiana 71201
(318) 325-6444
Facsimile (318) 323-7518

VOORHIES & LABBÉ
A PROFESSIONAL LAW CORPORATION

1924-1999
Celebrating 75 Years

700 St. John Street
Post Office Box 3527
Lafayette, Louisiana 70502-3527
(337) 232-9700
Facsimile (337) 235-4943

Website: www.vola.com
Email: vl@vola.com

Lamont P. Domingue
Mary McCrory Hamilton
Simone C. Dupré
George J. Armbruster III
Julie A. Scheib
Brent P. Frederick
James P. Doherty, III
Robert S. Hinyub, Jr.
Kristen B. Menard
Jeremy A. Hebert

Of Counsel
John W. Hutchison

Bennett J. Voorhies (1901-1970)
Donald Labbé (1900-1966)
D. Mark Bienvu (1931-1991)
Robert A. Lecky (1940-1998)

†Admitted to Practice in Georgia
†Admitted to Practice in Texas

Writer's Email: rsh@vola.com

November 23, 1999

Honorable Catherine B. Carter
Deputy Clerk in Charge
USDC, Western District of Louisiana
800 Lafayette Street, Suite 2100
Lafayette, LA 70501

RE: Joel A. Morvant, et al v. L&L Sandblasting
and CXY Energy, Inc.
Civil Action No. CV 99-1427-LO
Our File No.: 00551-0585

Dear Ms. Carter:

Enclosed please find the originals and one copy of L&L Sandblasting, Inc.'s May Call Witness List and Preliminary Exhibit List. Please file the originals into the record and return the copies, stamped with the date and time of filing to my office for my files.

- No Envelope

Thanking you in advance for your cooperation in this matter and, with kindest personal regards, I remain

Sincerely,

VOORHIES & LABBÉ


ROBERT S. HINYUB, JR.

RSH/kab/138896

cc: Mr. Kenneth Jacques
Mr. Bruce Hoefer